133-3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

SUBJECT: Summary Report for Areas A and D Groundwater Monitoring
FROM: Kathy Davies, Hydrologist

TO: Darius Ostrauskas, RPM October 14, 1998

I have reviewed the subject document and have the following comments:

Section 1.3.2. Methodology.
It was stated here that the majority of monitoring wells were sampled using a low-flow purging and sampling technique. Please explain the following: why this sampling technique was chosen, how well construction details and borehole logs were evaluated for the appropriate placement of the pump intake, why the method was not uniformly applied to all wells, and why stabilization criteria did not include redox and dissolved oxygen. Additionally, the field data supporting purging and sampling stabilization should be provided in the report. It should be further noted that the EPA Region III directive provided has been modified with no notation or reference. It is not clear that the purging and sampling methodolgy was appropriately utilized during this sampling event and that the resultant analyses may not be representative of site conditions.

Section 2.1.
The well screen intervals should either be added to Table 2-1 or Table B-1 should also be referenced here in the text.

Section 2.2. Page 2-6.
The statements here regarding significant water level fluctuations in areas west of the main building are contradictory to those presented on pages 4-7, 4-9 and 4-12 of the draft Area D Supply Well and Water Level Study Report.

The southern-most water level contours depicted on Figure 2-3 could also be drawn to have a much stronger western component of flow.

2.3.1.1. Page 2-12.
It is not clear as to why analytical results for PCE from SMC-01 were not included in the discussion relating the extent of PCE on-site and off-site. There appears to be pervasive PCE contamination in the north-west corner of the site which is both updip and upgradient of the well HN52 cluster. This is corroborated by data from the December 1997 sampling event

whereby HN-55S had 420 ppb PCE and HN-55I had 160 ppb PCE. (These wells have not been sampled since the December round). Additionally, it could be noted that there is an upward gradient in the 52I such that contamination in the intermediate zone could manifest itself in the shallow water bearing zones. It seems that additional sampling needs to be focused in this area to delineate the extent of both on-site and off-site PCE.

Page 2-14.
It is well accepted that the degradation of PCE and TCE can successfully occur with the frequent generation of the chemicals listed here (including vinyl chloride). This discussion should be rewritten to reflect current scientific beliefs.

Section 2.3.3.
460 ppb TCE does not seem to be a "relatively low level of VOC".

Section 2.4.1.1.
MW-E was reported in the other section to be in Area A.